

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DISH NETWORK L.L.C.,

Plaintiff,

v.

YAHYA ALGHAFIR, TEXAS
COMMUNICATION & TECHNOLOGY
LLC, SHENZHEN JIEMAO
TECHNOLOGY CO., LTD., and
SHENZHEN STREET CAT
TECHNOLOGY CO., LTD., individually
and together d/b/a Super Arab IPTV,

Defendants.

Case No. 4:20-cv-1678

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DISH NETWORK L.L.C.,	§
	§
Plaintiff,	§ Case No. 4:20-cv-1678
	§
v.	§
	§
YAHYA ALGHAFIR, TEXAS	§
COMMUNICATION & TECHNOLOGY	§
LLC, SHENZHEN JIEMAO	§
TECHNOLOGY CO., LTD., and	§
SHENZHEN STREET CAT	§
TECHNOLOGY CO., LTD., individually	§
and together d/b/a Super Arab IPTV,	§
	§
Defendants.	§

RENEWED UNOPPOSED MOTION TO WITHDRAW AS COUNSEL OF RECORD

TO THE HONORABLE GEORGE HANKS, JR., UNITED STATES DISTRICT JUDGE FOR
THE SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION:

COMES NOW, Samer Al-Azem and The Azem Firm (collectively “Counsel”), attorneys for Shenzhen Jiemao Technology Co. Ltd. (“Jiemao”) in the instant matter, and present this Renewed Unopposed Motion to Withdraw as Counsel of Record, and would show unto the Court the following:

In its Order of September 22, 2021¹, the Court ordered Jiemao, a Chinese company with no known presence in the United States, “to produce evidence it has retained counsel licensed

¹ *Order*, Document No. 41

to practice in the United States District Court for the Southern District of Texas within fourteen days of the date of this Order” at the risk of its pleadings being struck.

Thereafter, Jiemaio retained Counsel to represent it and Counsel filed an appearance in this matter on October 5, 2021. However, because of difficulties in the relationship between Counsel and Jiemaio that rendered the continued representation of Jiemaio by Counsel impracticable, Counsel sought, and received, permission from Jiemaio on January 28, 2022 to withdraw from further representing it in this matter. Thereafter, on January 31, 2022, Counsel filed an Unopposed Motion to Withdraw² which was denied by Judge David Hitner on February 1, 2022³.

Since then, the difficulties in Counsel’s representation of Jiemaio have kept increasing. In fact, ever since Counsel’s last lengthy written correspondence to Jiemaio on April 25, 2022, Counsel has not heard back *in any way* from its client. Counsel stands ready to proffer all communication attempts with Jiemaio and the problems relating to its representation thereof on an *in camera* basis if it were to please the Court. Moreover, The Azem Firm only has the undersigned in its employ, who had to undergo right rotator cuff and bicep surgery on May 26, 2022, the recovery period from which is expected to be six months, which further hinders Counsel’s efforts relating to any further representation of Jiemaio in this matter.

For these reasons, Samer Al-Azem and The Azem Firm respectfully request that the Court grant them permission to withdraw as counsel of record for Shenzhen Jiemaio Technology Co., Ltd.

² *Unopposed Motion to Withdraw as Counsel of Record*, Document No. 44

³ *Order*, Document No. 45

Respectfully submitted, this 3rd day of June, 2022

The Azem Firm

/s/ Samer Al-Azem

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ATTORNEY FOR DEFENDANT
SHENZHEN JIEMAO TECHNOLOGY CO. LTD.

CERTIFICATE OF CONFERENCE

The undersigned counsel hereby certifies that he has conferred with the attorney-in-charge for DISH Network, LLC in this matter on and that said attorney has indicated that he *does not* oppose this motion.

CERTIFICATE OF SERVICE

I certify that, contemporaneously with filing, a copy of the foregoing Renewed Motion to Withdraw as Counsel of Record was served by Notification of Electronic Filing by the Court's CM/ECF system and a courtesy copy of same has been forward to opposing counsel of record.

/s/ Samer Al-Azem

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